



State of New Jersey

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CATHERINE R. McCABE
Commissioner

December 21, 2018

CERTIFIED MAIL/RRR

7018 0680 0000 8443 9183

Mark Struble
Pequannock Water Department
530 Newark Pompton TPKE
Pompton Plains, NJ 07444

**RE: Recommended Actions for Newark Water Department's Consecutive Systems
Pequannock Water Department
PWSID No. NJ1431001
Letter No. LCR180004**

Dear Mark Struble:

The purpose of this letter is to recommend specific actions that Pequannock Water Department (Pequannock) should consider implementing because it purchases water from the Pequannock Gradient of the Newark Water Department (Newark) (PWSID NJ0714001). Pursuant to 40 C.F.R. § 141, Newark currently has a lead action level exceedance (ALE), a Maximum Contaminant Level (MCL) for Total Haloacetic Acids (HAA5s), and elevated Total Trihalomethane (TTHM) levels at several locations within its system.

Additionally, in early October of 2018, the New Jersey Department of Environmental Protection (DEP) was informed that new data collected by Newark demonstrated that the chemical used to control corrosion within their Pequannock Gradient is no longer effective and that the protective lining of the lead service lines is sloughing off, potentially carrying lead particles in the drinking water to consumers' taps. Newark submitted a draft corrosion control study report to the DEP, which recommended Newark switch its corrosion control inhibitors to address this issue; however, Newark must further evaluate their treatment system and conduct additional sampling and studies.

In the meantime, Newark has issued a public notification providing additional guidance on reducing one's exposure to lead and are providing point of use (POU) filters to those customers that may be affected as an interim measure as described on their website, <https://www.newarklead serviceline.com/>, and on the DEP's website, <https://www.nj.gov/dep/watersupply/>.

In accordance with the Federal Lead and Copper Rule (LCR) at 40 C.F.R. § 141.80 et seq., the DEP completed a technical review of Newark's consecutive systems. Within this letter are the DEP's findings and recommendations specific to Pequannock.

Pequannock Findings

- Pequannock's water supply is from Newark's Pequannock Gradient, Riverdale Water Department (PWSID NJ1433001), and its own groundwater sources.
- There is no history of a lead ALE in Pequannock; however, the last sampling occurred in 2016. Under separate correspondence, the DEP will be addressing the status of Pequannock's lead and copper monitoring requirements.
- The number of lead service lines in Pequannock is unknown at this time.
- A Lead and Copper Sampling Plan and a Water Quality Parameter Sampling Plan were requested by the DEP on October 10, 2018 and both have been received.
 - DEP sent a letter on December 5, 2018 regarding deficiencies in Pequannock's materials evaluation as well as additional deficiencies with the Lead and Copper Sampling Plan. An updated Plan addressing the identified deficiencies is required to be submitted no later than January 5, 2019.
 - DEP sent a letter on December 12, 2018 regarding deficiencies with the Water Quality Sampling Plan. An updated Plan addressing the identified deficiencies is required to be submitted no later than January 12, 2019.
- Pequannock triggered TTHM Stage 2 Operational Evaluation Levels (OEL) pursuant to 40 C.F.R. § 141.626(a) during the 2nd and 3rd quarters of 2018, as outlined in letters DEP sent on July 13, 2018 and September 25, 2018, respectively. An OEL report is due by December 19, 2018 as set forth in 40 C.F.R. § 141.626(b). This is not an MCL violation.

Lead Recommendations

Based on the information the DEP currently knows about the ineffectiveness of Newark's corrosion control treatment in the Pequannock Gradient, Newark's sampling data, and the fact that DEP does not have detailed data, demonstrating whether the corrosion control treatment is effective within Pequannock, DEP strongly recommends the following actions be taken by Pequannock as soon as practicable for the protection of the public health:

Public Education/Public Notification

- Provide public education to customers with known lead service lines, lead interior plumbing materials, those customers suspected of having either, and/or individual lead sample results greater than the lead action level of 15 parts per billion (ppb).
- In the public education materials, address the following:
 - Flushing may not reduce lead levels in drinking water for those with lead service lines and that those customers with lead service lines or with unknown service lines should consider using bottled water or a point of use (POU) filter that is approved to reduce lead certified by National Sanitation Foundation (NSF) International until further notice.
 - Flushing is still an effective means of reducing exposure for those without a lead service line, i.e., internal pipes and fixtures with lead-containing materials.
- Prior to the POU filters being installed, for those with known or unknown lead service lines, the New Jersey Department of Health recommends that bottled water be used for infants who are being fed with formula, and for all children under the age of six.
- Provide information on how customers can have their water tested.

- Note that the New Jersey Department of Health recommends that children under the age of six have their blood lead levels screened as soon as possible regardless of previous blood lead testing history by their primary health care provider and include information on how testing can be done for free by the local health department for those without insurance.
- Provide an overview of Newark's corrosion control treatment and the potential impacts on the Pequannock water supply.

Water Testing

- Offer water quality testing for lead to its customers.

Coordination with Newark

- Coordinate with Newark to evaluate potential impacts to Pequannock's system from proposed changes to Newark's corrosion control treatment and disinfection treatment processes including additional water quality parameter monitoring, sequential sampling, and conducting a demonstration study in accordance with EPA's *Corrosion Control Treatment Evaluation Technical Recommendation for Primacy Agencies and Public Water Systems*, dated March 2016.

Additional information pertaining to the recommendations above may be found on the Division's website at <https://www.nj.gov/dep/watersupply/dwc-lead-public.html>.

TTHM & HAA5 Recommendations

- Pequannock should continue to evaluate remedial measures to address its own disinfection byproduct issues while working closely with Newark. Pequannock's 3rd quarter OEL Report is due by December 19, 2018 as set forth in 40 C.F.R. § 141.626(b).

Remedial measures undertaken to address a particular contaminant can adversely affect other contaminants within the treatment train and/or distribution system. The United States Environmental Protection Agency prepared a guidance document, *Simultaneous Compliance Guidance Manual for the Long Term 2 and Stage 2 DBP Rules*, to assist water systems that need to address multiple contaminants within their water system. This guidance manual can be accessed at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=60000E2Q.txt>.

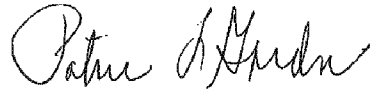
It is recommended all communications/notifications concerning issues in this letter involve both Newark and the DEP.

To ensure adequate communication and coordination between Newark and Pequannock, the Bureau is requesting a written response to this letter from Pequannock to be submitted electronically to watersupply@dep.nj.gov **on or before January 11, 2019**. In addition, Pequannock shall provide an update on the revised sampling plans in its response, including an update on the number of known lead service lines within Pequannock's service area.

Your prompt attention to this matter is both necessary and appreciated. Note that it is possible additional information and/or action may be necessary as both the Federal and State Safe Drinking Water programs continue to assess the implementation of the Federal Lead and Copper Rule to ensure the continued protection of public health.

If you have any questions regarding the above, please contact Laura Scatena at 609-292-2957 or by email at laura.scatena@dep.nj.gov. When contacting the DEP please reference the PWSID No. 1431001 and Letter No. LCR180004.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia L. Gardner". The signature is fluid and cursive, with the first name "Patricia" being more prominent than the last name "Gardner".

Patricia L. Gardner
Director, Division of Water Supply & Geoscience

cc: Northern Bureau of Water Compliance and Enforcement
Mark Struble, Licensed Operator, 24 Duncan Ave., Pequannock, NJ 07440
Jerry Notte, Licensed Operator, Newark Water Department
Kareem Adeem, Acting Director of Public Works, Newark Water Department
Linda Ofori, Bureau Chief, Bureau of Water System Engineering